## **EXHIBIT 4**

09-50026-mg Doc 7294-4 Filed 10/12/10 Entered 10/12/10 11:28:27 Exhibit 4 - PROPOSED ORDER Pg 2 of 2

UNITED STATES BANKRUPTCY COU	RT
SOUTHERN DISTRICT OF NEW YORK	<b>(</b>

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

Debtors. : (Jointly Administered)

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## ORDER GRANTING MOTION OF THE JUNSOS TO BE DEEMED TO HAVE FILED AN INFORMAL PROOF OF CLAIM OR, ALTERNATIVELY, FOR LEAVE TO LATE FILE A PROOF OF CLAIM

Upon the motion of the Junsos to be deemed to have filed an informal proof of claim or, alternatively, for leave to late file a proof of claim (the "Motion"); due and proper notice of the Motion, in the manner described therein, having been provided and no other or further notice needing to be provided; and the Court having found and determined that the relief sought is appropriate based on the unique circumstances described in the Motion and balance of hardships described therein and in the supporting affidavit of Kevin Junso; and after due deliberation and sufficient cause appearing therefor, it is therefore

ORDERED that the Junsos shall be deemed to have filed through their objection to the 363 Sale an informal proof of claim, which filing shall be deemed a timely-filed proof of claim against the Debtors; and it is further

ORDERED that the Junsos shall be deemed to have submitted all their claims to the ADR Procedures, to have capped their aggregate claims in an amount not to exceed \$10,955,655.98, and to have capped their individual claims in the amounts set forth in the Capping Letter.

Dated: New York, New York
October \_\_\_\_\_, 2010

United States Bankruptcy Judge

<sup>&</sup>lt;sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to them in the Motion.